

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF VIRGINIA
3 RICHMOND DIVISION

CONFIDENTIAL

4 RICHARD WALKER,

5 Plaintiff,

6 v.

CIVIL ACTION NO. 3:20-cv-773

7 ALLIANCE OUTDOOR GROUP, INC.,
and
8 ALLIANCE OUTDOORS PRODUCTS, INC.,
d/b/a X-STAND TREESTANDS,

9 Defendants.

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14 AUDIO-VISUAL VIDEOTAPED
15 DEPOSITION UPON ORAL EXAMINATION
16 OF NATHAN M. STIEREN,
17 TAKEN ON BEHALF OF THE PLAINTIFF

18
19 Unionville, Missouri

20 August 31, 2021



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24 KATHLEEN BEARD ADAMS, CCR, RPR, CRR
25 Court Reporter

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1	beneath the protective layer; is that right?	1 foundation.
2	MR. SUTTON: Objection to form.	2 A. Yeah. I don't really know what context
3	A. Well, just a general statement is, you	3 you're putting that in. You're -- I would be
4	know, steel is a corroding part. The protective	4 completely speculating by -- by answering that.
5	cover is -- I don't know what material it's made,	5 BY MR. SPINELLI:
6	but it's -- it's not made of steel.	6 Q. But it's foreseeable that during the use
7	BY MR. SPINELLI:	7 of the treestand one might stumble and fall against
8	Q. All right. And -- and the -- the steel	8 the upper portion of the stand; right?
9	is -- is inside the -- the protective part; right?	9 MR. SUTTON: Objection to form and
10	A. That's correct.	10 foundation.
11	Q. Okay. The treestand failed in this case	11 A. Again, I think the answer is the same.
12	because of corrosion and fatigue; correct?	12 You know, I -- I don't know anything about the
13	MR. SUTTON: Objection to form, assumes	13 context of -- of the question. I -- you know, I'd
14	facts not in evidence, and foundation. He just told	14 be -- I'd be completely speculating.
15	you he didn't know what -- what was going on. I	15 BY MR. SPINELLI:
16	mean, come on.	16 Q. Have you ever used the treestand at
17	BY MR. SPINELLI:	17 issue in this case?
18	Q. Do you need to have the question	18 A. You know, I don't remember. If -- if I
19	repeated?	19 had it would have been many years ago, but I -- I
20	A. Please.	20 can't say one way or another.
21	Q. Okay. The treestand failed in this case	21 Q. Have you ever gone hunting with using a
22	because of corrosion and fatigue; correct?	22 two-part treestand before?
23	A. I don't know --	23 MR. SUTTON: Objection to form.
24	MR. SUTTON: Objection to form,	24 A. You know, I don't think that I have, but
25	misstates --	25 I don't know if I -- I don't know if I have or not
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1	A. I don't --	1 actually went hunting with one.
2	MR. SUTTON: -- misstates facts. Go	2 BY MR. SPINELLI:
3	ahead.	3 Q. Have you ever gone hunting in a
4	A. I don't know the details of the case. I	4 treestand of any type?
5	would just be speculating.	5 A. Yes.
6	BY MR. SPINELLI:	6 Q. Okay. When was that?
7	Q. Okay. You don't know whether pinch	7 A. I hunt -- I hunt every year. I -- so
8	points are created on the cable when you fold in the	8 maybe last fall would have been the last time.
9	wings of the stand; is that right?	9 Q. What kind of treestand do you use?
10	MR. SUTTON: Objection to form.	10 A. We mostly use box blinds and ladder
11	A. Yeah. Again I'm not really sure what --	11 stands. And just sometimes I will go to an
12	what -- what you're asking.	12 outfitter and we just use, you know, whatever they
13	BY MR. SPINELLI:	13 have. They'll have their own equipment.
14	Q. What were the differences between the	14 Q. Got you. Have you ever -- have you ever
15	2015 and later models?	15 stumbled or misplaced your foot while using any of
16	A. I don't know the answer to that.	16 those treestands?
17	MR. SUTTON: Objection, foundation.	17 A. Not that I can remember.
18	BY MR. SPINELLI:	18 Q. Okay. But it's -- it's -- it's
19	Q. You don't know who actually manufactured	19 certainly possible for -- for that to happen; right?
20	the steel wire for the 2015 product?	20 MR. SUTTON: Objection to form.
21	A. That's correct.	21 Q. It hasn't happened in your recollection,
22	Q. It's foreseeable from a design	22 but it's certainly possible that that could happen;
23	perspective that someone might stumble and fall	23 right?
24	against the upper stand; right?	24 MR. SUTTON: Objection to form and
25	MR. SUTTON: Objection to form and	25 foundation.